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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11
Plaintiff,
12
v.
13 WILLIAM LEE ROBINSON
14 Defendants.
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CASE NO: 1:21-CR-00207-NONE-SKO

**STIPULATION AND ORDER BETWEEN THE
PARTIES REGARDING PROTECTED
INFORMATION**

16 WHEREAS, the indictment in this case charges defendant with interstate communication
17 conveying a threat of bodily injury with intent to extort and cyberstalking.

18 WHEREAS, the discovery in this case contains personal information regarding the alleged
19 victims of defendant's conduct and information regarding those alleged victims' cooperation or
20 noncooperation in the government's investigation (the "Protected Information");

21 WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the
22 unauthorized disclosure or dissemination of this information to anyone not a party to the court
23 proceedings in this matter; and

24 WHEREAS, the parties agree that entry of a stipulated protective order is appropriate.

25 THEREFORE, defendant WILLIAM LEE ROBINSON, by and through his counsel of record
26 ("Defense Counsel"), and plaintiff the UNITED STATES, by and through its counsel of record, hereby
27 agree and stipulate as follows:
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1 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
2 Criminal Procedure, and its general supervisory authority.

3 2. This Order pertains to all discovery provided to or made available to Defense Counsel is
4 part of discovery in this case (hereafter, collectively known as “the discovery”).

5 3. By signing this Stipulation, Defense Counsel agrees not to share any documents that
6 contain Protected Information with anyone other than Defense Counsel and designated defense
7 investigators and support staff. Defense Counsel may permit the defendant to view unredacted
8 documents in the presence of their attorneys, defense investigators, and support staff. The parties agree
9 that Defense Counsel, defense investigators, and support staff shall not allow defendant to copy
10 Protected Information contained in the discovery. The parties agree that Defense Counsel, defense
11 investigators, and support staff may provide the defendant with copies of documents from which
12 Protected Information has been redacted.

13 4. The discovery and information therein may be used only in connection with the litigation
14 of this case and for no other purpose. The discovery is now and will forever remain the property of the
15 Government. Defense Counsel will return the discovery to the Government or certify that it has been
16 destroyed at the conclusion of the case.

17 5. Defense Counsel will store the discovery in a secure place and will use reasonable care to
18 ensure that it is not disclosed to third persons in violation of this agreement.

19 6. Defense Counsel shall be responsible for advising the defendant, as well as Defense
20 Counsel’s employees, other members of the defense team, and defense witnesses, of the contents of this
21 Stipulation and Order.
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7. In the event that either defendant substitutes counsel, that defendant's Defense Counsel agrees to withhold discovery from any new counsel unless and until substituted counsel agrees also to be bound by this Stipulation and Order.

IT IS SO STIPULATED.

DATED: December 13, 2021

/s/ Jaya Gupta

JAYA GUPTA

COUNSEL FOR WILLIAM LEE ROBINSON

/s/ Vincente A. Tennerelli

VINCENTE A. TENNERELLI

COUNSEL FOR UNITED STATES

ORDER

IT IS SO ORDERED.

Dated: December 15, 2021

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE